

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	15-CR-10127-MLW
	)	
TIMOTHY FLAHERTY	)	

**JOINT INITIAL STATUS REPORT**

Pursuant to Local Rule 116.5(a), the parties file this status report prior to the Initial Status Conference set for July 1, 2015.

1. Status of Discovery

The government provided automatic discovery by letter dated June 17, 2015. Pursuant to Fed. R. Crim. P. 16(b) and Local Rule 116.1(d), the government requested reciprocal discovery in the June 17, 2015 letter.

2. Timing of Additional Discovery to be Produced

The government is aware of a recorded call setting up the December 24, 2015 meeting between R. B. and the defendant and is in the process of transferring it to CD. In addition, the government is in possession of a security video depicting the incident between Ralph Feinberg and R.B; this video is being copied and will be provided to the defendant. To the extent that the government identifies any additional discoverable material, it will be disclosed promptly.

3. The Timing of Any Additional Discovery Requests

The defendant has requested additional discovery through a letter dated June 26, 2015 (Docket # 21). Furthermore, the defendant filed a motion for further discovery on June 9, 2015 (Docket # 17). The government filed a motion to strike the defendant's discovery motion on June

22, 2015 (Docket #19) which was opposed by the defendant on June 26, 2015 (Docket #20). The parties will file additional discovery requests promptly upon determining that such a request is needed.

4. Protective Orders

The parties do not believe that any protective orders are necessary at this time and would like to revisit this issue at the Interim Status Conference.

5. Pretrial Motions

The parties request that the timing of pretrial motions be addressed at an Interim Status Conference.

6. Expert Witness Disclosures

The parties request that the timing of expert disclosures be addressed at an Interim Status Conference.

7. Periods of Excludable Delay under the Speedy Trial Act

All periods of time have been excluded under the Speedy Trial Act through July 1, 2015. The parties jointly and respectfully move that this Court exclude the time between July 1, 2015, and the Interim Status Conference in the interests of justice as defendant requires additional time to review the discovery in this case.

8. Interim Status Conference

The parties respectfully request that the Court schedule an Interim Status Conference to occur in approximately 30 days.

Respectfully submitted,

CARMEN M. ORTIZ  
United States Attorney

TIMOTHY FLAHERTY  
By his attorney,

By: /s/ Robert A. Fisher  
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Dated: June 29, 2015

**Certificate of Service**

I hereby certify that, on the above date, this document was filed through the ECF system which sends copies electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Robert A. Fisher  
Robert A. Fisher  
Assistant U.S. Attorney